

Exhibit L

Elaine E. Mandelkow

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

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ELAINE E. MANDELKOW., et al.,

**AFFIDAVIT OF
ELAINE E. MANDELKOW**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF KINGS)

ELAINE E. MANDELKOW, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 340 16th Street, Brooklyn, New York 11215.

2. I am currently 62 years old, having been born on August 25, 1959.

3. I am the wife of James William Mandelkow Jr., upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from gastric/esophageal cancer on December 10, 2013 at the age of 54. It was determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. James (Jim) and I had a wonderful relationship. We did practically everything together. We enjoyed traveling, often to Atlantic City or to see relatives. He would take me shopping, to doctor's appointments, wherever I needed to go. I have a bad back, so Jim always played the role of chauffer. Our favorite thing to do together, however, was spend time with our three children. Jim was handy around the house, and he used to do everything himself. He taught our children how to be handy as well and often let them help with repairs. He enjoyed

having them do things with him. After his passing, I had to do all those things myself or hire people to help me.

6. Jim was a Deputy Chief Inspector for the FDNY. He was stationed at the Duane Street Firehouse, located at 100 Duane Street. He began inspecting buildings within the exposure zone every day for three months, starting on September 12, 2001. He was constantly searching through dusty buildings surrounding the exposure zone, breathing in the toxic air.


7. In the beginning of 2013, doctors at NYU discovered a nodule on Jim's kidney. He had lost twenty-five pounds, which gave me cause for alarm. We went to see a vascular doctor who discovered that Jim had four blood clots, two in each leg. On May 2, 2013, he was put on heavy-duty blood thinners. Two days later, Jim was vomiting non-stop. The following Monday (May 6th), he still went into work. He came home around noon, not feeling well, so I took him to the hospital. The following day, on May 7th, Jim was diagnosed with Stage IV esophageal cancer. The cancer had already spread to his stomach.

8. The day we went to the kidney doctor, Jim weighed 301 pounds. Six months later, he was 125 pounds. In a very short time, he went from a perfectly healthy man to being terminally ill. This was completely shocking to me. Jim had undergone an MRI shortly before we learned of the kidney nodule. I thought to myself, "How could the doctors have missed this tumor?" But that was the nature of esophageal cancer—it grew extremely quickly and unexpectedly. We barely had time to grasp that Jim was sick, let alone wrap our heads around the fact that he was going to die.

9. I was Jim's primary caretaker during his illness. His illness put a huge financial burden on our family. It seemed like there were a million co-payments and medications that the insurance company didn't want to pay for. His blood thinners cost \$125 for three shots, and I had to administer them to him myself at home. Jim was out on FMLA leave from the Fire Department in the beginning, and then we applied for retirement disability, but that didn't come through until Jim died. Things were tough. Jim worked a lot of overtime while he still could. We saw so many doctors. He did PET scans, MRIs, and all sorts of other scans. Two days after Jim's death, I received a hefty hospital bill for his esophageal stent. My financial situation continued to suffer after Jim's death. I had no income for fourteen months. It took them over six months to pay out Jim's death pension. So, I went back to work. I had a bad back and should

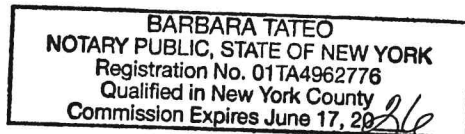
not have been working, but I did what I had to do. Plus, I still had two children in college at the time Jim died, and they depended on my help.

10. Jim's illness and passing absolutely devastated me. Jim was my best friend in the whole world. His illness changed our family indescribably. We were a truly happy family, and since Jim passed away, our lives have been empty. In the last eight and a half years since he passed, we haven't put up a Christmas tree. We rarely celebrate any holidays because it's too painful for us. My daughter graduated college nineteen days after her father died, and she has never gotten over his death. I talk about Jim a lot, and there are times where I break down and cry. My kids are worried about me because I live alone. If their father was still alive, they wouldn't have to worry about me at all. I think about the plans we had for our retirement, and now it's all gone. Jim died at the age of 54. We should have been retiring around now and looking forward to the rest of our lives. I'm nearly 63 years old, and I don't know what my life looks like going forward. All I see is a future alone and a lot of "what might have been."


ELAINE E. MANDELKOW

Sworn to before me this
13th day of May, 2022


Notary Public



Melany E. Mandelkow

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
ELAINE E. MANDELKOW., et al.,

**AFFIDAVIT OF
MELANY E. MANDELKOW**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.
-----X

STATE OF NEW YORK)
 : SS.:
COUNTY OF KINGS)

MELANY E. MANDELKOW, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 340 16th Street, Brooklyn New York 11215.

2. My current age is 31, having been born on April 25, 1991.

3. I am the daughter of James William Mandelkow Jr., upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from gastric/esophageal cancer on December 10, 2013. It was medically determined that this illness was causally connected to the toxins resulting from the September 11, 2001, terrorist attacks.

5. I had a close relationship with my father. When I was younger, we would go bike riding together. I remember when I started college, I didn't have any friends, so my dad would drive to my college campus to have lunch with me since it was close to where he worked. My dad would drive me to school whenever I had an exam, so I could get some extra studying done in the car. He would pick me up from school whenever I had a bad day.

6. On September 11th, 2001, I was evacuated from school. I remember my dad was home and went to work shortly thereafter. He was a Deputy Chief for the FDNY. He had taken the day off, but after the towers fell, he went into the city to help in any way he could. I was only 10 years old, so I don't remember much from that time. But I recall that he was not around for dinner a lot in the weeks and months following 9/11. Some days, I would stay up until 1:00 or 2:00 a.m. just waiting for him to come home. He was a fire inspector, and he would tell me about searching through buildings around Ground Zero.

7. My dad went to the emergency room in May of 2013. I was in nursing school at the time, and I went to the ER to see my dad after I finished one of my finals. I was in the room with my dad, but when the doctor came to talk to him, my mom made me leave the room. That made me suspicious. I kept asking my mom what was wrong. My mother told me, without my brothers present, that my father was diagnosed with Stage IV cancer. I think she told me first because she was afraid, I might figure it out.

8. They put a port in my dad's chest to administer chemotherapy. I remember that he came home from the hospital with the chemo pump and would have to carry around the bag with the device dispensing the chemo. He couldn't really eat, because the tumor was in his sphincter (where the esophagus meets the stomach). The doctors would prescribe him nutritional shakes so that he could get some nutrients into his body. It was really hard to find food that he could swallow without causing him pain. I also remember he was given pain medication, mostly because he couldn't eat or swallow comfortably. He had fentanyl patches that had to be changed once every forty-eight hours. He really couldn't do anything because he was in so much pain.

9. I helped take care of my father. I would change the fentanyl patches and give him insulin shots. I would spend time with my father, just sitting at home watching television on the couch with him. We would watch the history channel together. He would fall asleep on the couch because he was so exhausted from the chemotherapy. I was just grateful to be able to spend time with him.

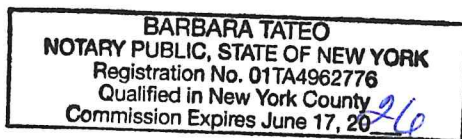
10. My father's illness and passing left a great emotional impact on my life. I will never see my dad again. He never even got to see me graduate college. I can't stand weddings, not even the ones in movies. Whenever I see a woman getting walked down the aisle by her father, I start crying, because I will never have that.

11. My father died on December 10, 2013, and I graduated from college on December 19, 2013. My graduation was really depressing. My dad was the only one in our family who could drive, so my mom and brother were twenty minutes late to the ceremony (the ceremony was only an hour long). I remember sitting there, and I kept looking back to see my mom and she wasn't there. I kept thinking that no one in my family would see me graduate and feeling like it was all for nothing. When my name was called and I went to the stage, one of the teachers pulled me aside and told me my dad would be proud. Between the funeral, my final exams, and getting ready for my graduation, everything was a blur. I remember feeling really empty after my graduation. I wish my father was there to see me graduate—I knew he would have been so proud of me. I miss my father terribly.


MELANY E. MANDELKOW

Sworn to before me this
7th day of ~~June~~ July, 2022


Notary Public



Estate of Victor L. Accurso

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
ELAINE E. MANDELKOW, et al.,

**AFFIDAVIT OF
DIANE E. ACCURSO**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF TENNESSEE)
 : SS.:
COUNTY OF HAMILTON)

DIANE E. ACCURSO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 1188 Pendall Lane, Soddy Daisy, Tennessee 37379

2. I am currently 71 years old, having been born on May 11, 1950.

3. I am the wife of Victor L. Accurso, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.

4. My husband passed away from esophageal cancer on January 31, 2017. It was medically determined by the World Trade Center Health Program that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. On July 26, 2017, I was appointed personal representative of my husband's estate by the Chancery Court for Hamilton County, Tennessee.

6. For 48 years, my husband and I were inseparable. We were practically joined at the hip. We made several moves – from New York to Florida and then finally to Tennessee, and we always made it an adventure. The list of activities we liked to do together was truly endless –

fishing, bowling, sightseeing, camping, wave running, boating, and running, just to name a few. We worked on the yard, would go to the movies, and get together with friends. We were always together, whether at home or out. It was a wonderful marriage.

7. On 9/11, Victor was down at the pit as a part of search and recovery. He said it was horrific. Victor met a lot of young men at the pile that he became a mentor to because he was able to keep it together while sifting through the wreckage. It was traumatic for everyone.

8. Victor's illness started out inconspicuously. He had hiccups that he could not get rid of. We made the decision to go to a doctor and have his throat scoped, which revealed that he had cancer. He started radiation and chemotherapy treatments from there. The doctors tried many different treatment options, but there was no holding back his cancer. From there, things continued to get worse. Victor lost his appetite. He just couldn't eat, even though I would cook all his favorite foods. He wanted to eat, he just couldn't. He only nibbled here or there. He went from a big burly Italian man down to nothing.

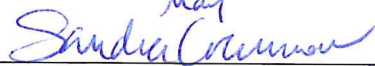
9. Victor's illness took a great toll on him. He had trouble balancing, which naturally made it difficult for him to stand, much less walk. He became wheelchair bound and needed a shower chair. Victor's illness took away his dignity. He had chronic constipation and became incontinent. He felt as though his body was just giving out. He wasn't able to travel, even short distances, because of these conditions. It was hard for Victor to ask for help. He was always the one giving help, not receiving it. He ultimately lost his job because he couldn't work anymore.

10. Victor never had a chance to meet his grandson. We would have loved being a grandfather. He always dreamed about it. Our grandson is like him in so many ways. I know Victor protects him from above. Victor is missing out on so many wonderful moments with his family, so many milestones. There is still so much more we could be doing. He was in the prime of his life, and it was all taken from him. All he wanted was to have our house paid off, and for the kids to grow up happy and healthy. He wanted us to grow old together, hand in hand, and

we'll never have that now. All that's left are the beautiful memories.


DIANE E. ACCURSO

Sworn to before me this
2nd day of ~~April~~^{May}, 2022


Notary Public *expires 6/24/2023*



Estate of Steven J. Acevedo

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
ELAINE E. MANDELKOW, et al.,

Plaintiffs,

**AFFIDAVIT OF
MARILYN GUICHARDO**

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

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STATE OF FLORIDA)
 : SS.:
COUNTY OF OSCEOLA)

MARILYN GUICHARDO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 1081 Quaker Ridge Lane, Davenport, FL 33896.

2. I am currently 64 years old, having been born on February 21, 1958.

3. I am the wife of Steven Acevedo, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.

4. On November 16, 2016, my husband passed away from liver cancer at the age of 58. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attack.

5. On January 10, 2017, I was issued Letters Testamentary on behalf of my husband's estate by the Surrogate's Court of the State of New York, Bronx County.

6. Steven and I did just about everything together. We enjoyed going on walks, seeing movies, going out to dinner, and attending social gatherings. Steven was in the military, so I was also involved in his military and police life with his friends.

7. I was home on September 11, 2001. Steven was in the Army National Guard at the time. He told me that his military orders had been activated and that he would be going down to Ground Zero to work on the search and recovery operations. He responded for a total of 21 days, starting on September 12, 2001. He was down there looking for bodies in the rubble.

8. I was very angry at myself for years for not catching his illness earlier. He always told me, "Marilyn, I have agita. Do you have some Mylanta?" It never occurred to me that those pains were anything serious. We moved from Manhattan to Westchester because Steven said he wanted to retire soon. I didn't know it at the time, but it was really because he didn't have the energy to live in the city anymore. Whenever I came home from work, he'd either be sitting on the couch or sleeping. I assumed it was because he was getting older and working overtime. But in actuality, he was dying. He would tell me, "Marilyn, I'm not going to make it to 65." I would say, "Steven, what are you talking about?" I didn't like when he said things like that. He was my rock, and I needed him to be around. Steven knew I didn't like Westchester and would prefer to move back to the city, so we drove into the city looking for apartments. His friend's father had recently passed away and he had owned an apartment in NYC. Steven said he could make it work, so we moved into that apartment on July 1, 2015.

9. A few weeks into living in the new house, I walked in on him in the bathroom spitting up blood. I was shocked. We made an appointment at the Bronx VA Hospital. After the visit, the doctor called and told me that Steven's liver numbers were high and asked how long he had been drinking? I was confused because Steven was never a drinker. The doctor told me he needed to come in for a CT scan. He was diagnosed with cirrhosis of the liver in one corner. They ran several more tests on him. I wanted to donate my liver to him for transplant, but they said it was too late for surgery because Steven's arteries and veins were deteriorating too rapidly.

10. Steven's illness was a horrible sight to see. He didn't have the energy that he once had. He was always a very "rah-rah" kind of guy. He became very off balance and was in a lot of pain from fluid in his stomach. His belly was distended like he was nine months pregnant. He couldn't walk; he waddled more than he walked. I had to get Pampers for him, because his diarrhea was so bad. He was always cold. I would take him into the shower in the hospital bathroom and turn on the steam just so he wouldn't be so cold. He couldn't hold down any food and immediately vomited if he tried to eat anything. My heart broke just watching my husband

go through all these terrible things. His skin turned yellow about two weeks before he died from the liver disease.

11. Once he learned his prognosis was terminal, he broke down and cried. I don't think he was giving up; I just believe he was making peace with his fate. I saw his mental state change. One day, Steven was lying in his hospital bed, and he told me that he saw his mother and brother. Both his mother and brother were deceased. He said, "Marilyn, I saw them. They are waiting for me." Another time, when he was in hospice, I came into his room to find him singing. He told me, "I'm singing to Jesus. I'm going to go see Jesus." He was accepting his death, and basically telling me that I should accept it too.

12. Before his death, he just laid there and stopped talking. He was very quiet. One day, I looked at him and said, "Steven, I'm here." He was just staring, but he couldn't see me. I knew that his death was coming soon. I held his hand, kissed him, and climbed into the hospital bed with him. That's when he took his last breath. I didn't want to let go.

13. Steven shouldn't have died. He was a brilliant, educated, loving man. He had a master's degree, spoke three languages, and traveled the world. He was a soldier. He went to war so that we could have the liberties we have today. Steven would give you the shirt off his back. He was a good soul. When he was responding at Ground Zero, he gave other soldiers his cot to sleep on when they didn't have one. He never thought of himself. He always thought of others and his family first. This never should have happened. He shouldn't have died and left us alone. But he left a legacy that I am so very proud of. His legacy is the relationship he had with his sons, and the knowledge he shared with them. Sometimes my sons will say something, and I'll think, "Wow, that's Steven right there." I see Steven in both my sons. Maybe they don't realize it, but I do.


MARILYN GUICHARDO

Sworn to before me this
18 day of April, 2022


Notary Public NORMAN RUSCETTE



NORMAN RUSCETTE
NOTARY PUBLIC
STATE OF FLORIDA
Comm# GG933291
Expires 12/7/2023

Estate of Charles William Achong

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

ELAINE E. MANDELKOW, et al.,

**AFFIDAVIT OF
ROSEMARY ACHONG**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY)
: SS.:
COUNTY OF MONMOUTH)

ROSEMARY ACHONG, being duly sworn, deposes and says:


1. I am a plaintiff in the within action, am over 18 years of age, and reside at 2004 Parkview Terrace, Spring Lake Heights, NJ 07762.
2. I am currently 66 years old, having been born on October 23, 1955.
3. I am the wife of Charles Achong, upon whom my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.
4. On March 29, 2018, my husband died from prostate cancer. It was medically determined that this illness was causally connected to the toxins resulting from the September 11, 2001 terrorist attacks.
5. On April 25, 2018, I was appointed personal representative of my husband's estate in the Monmouth County, New Jersey Surrogate's Court.
6. Charles ("Chuck") and I were married for forty years before he died. He was very active and loved to golf. We traveled extensively. We were very, very close—he was my best friend. We led active and busy lives before Chuck got sick.

7. Chuck worked for the Jersey City Fire Department. They all went down to the World Trade Center as volunteers. They worked for days on the pile, until they couldn't find any more survivors. He was traumatized by the experience. He wouldn't talk about it because it was so horrific.

8. I noticed that Chuck started to slow down a bit. He fatigued more easily. His energy level wasn't as high as it usually was, and he told me he was having lower back pain. Being a typical male, Chuck wouldn't go to the doctor. I'm a registered nurse, and I noticed that he had an enlarged prostate. I told him he needed to go to the doctor. They ran a PSA test on him. A normal PSA level is around 4.0, and Chuck's PSA came back at 192. He was diagnosed with prostate cancer a week later. It was a death sentence. He was diagnosed in July 2017 and died within eight months. By the time we found out about his diagnosis, his prostate cancer had already metastasized.

9. When Chuck was first diagnosed with prostate cancer, he was 6'4 and probably 300 pounds. He lost all his appetite and lost weight extremely quickly. He totally lost his energy. He couldn't golf anymore or do any of the activities he wanted to do. He definitely was depressed. He shut down, and he didn't want to talk about anything. He got chemotherapy at Sloan Kettering starting in September 2017. That stopped at the end of December 2017, because the doctors saw that it wasn't working. At that point, his cancer was getting worse. Once the doctors stopped the chemotherapy, he knew he was going to die. I had to put him in hospice care. He passed in March 2018. It was an awful experience. He was in a lot of pain.

10. Chuck's life ended way too early. He was only 67 years old. I was getting ready to retire, but we shouldn't have waited. We lost the opportunity to travel the world together. We have a daughter, and she's getting married this summer. He won't be able to walk her down the aisle. She found a fire truck that will carry her to her wedding. She's finding ways for him to be involved in her life, even though he's not here anymore. We miss Chuck, and it saddens us that he had to die that way.


ROSEMARY ACHONG

Sworn to before me this
8 day of April, 2022


Notary Public

KIMBERLEE S. FARRO
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Dec. 10, 2024

Estate of Daniel Victor Armenta

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
ELAINE E. MANDELKOW, et al.,

**AFFIDAVIT OF
DORIS ARMENTA**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF CALIFORNIA)
: SS.:
COUNTY OF SAN MATEO)

DORIS ARMENTA, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 236 Taylor Boulevard, Millbrae, California 94030.
2. I am currently 65 years old, having been born on May 3, 1957.
3. I am the wife of Daniel Victor Armenta, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.
4. My husband passed away from metastatic bladder cancer on November 25, 2013. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.
5. On April 24, 2015, I was issued Letters Testamentary on behalf of my husband's estate in the Superior Court of California, County of San Mateo.
6. My husband was my rock. He was my everything. He was the foundation of our family, not only our immediate family but also my brothers, my mom—everyone. Everyone went to Dan. He was like the godfather of the family. We had a very good relationship. We took

great vacations together with our children. My husband loved life and his family. He lived every day to the fullest. Daniel helped everyone. He always gave to others. There is a big void in our lives now, a huge emptiness. Even after eight years. It's a new way of living. A different life.

7. As soon as my husband learned of the World Trade Center attacks on 9/11, he flew from California to New York. He was a Lieutenant fireman with the San Francisco Fire Department. Dan and eleven of his fireman friends flew to New York to help on the pile. I didn't want him to go because I was worried that it wouldn't be safe. But Daniel had to go. That's the kind of person he was. He had to help. He knew many people in the FDNY and had friends who perished in the collapse of the towers. Daniel remained at Ground Zero for a total of three weeks to a month. When he came back, it was quite an adjustment. He told me, "If I knew what hell was like, I would call it hell." He said it was hard, very hard. He would see children's shoes in the pile. He would find a body part here and there. He said it was like nothing he could imagine in his whole life. It was extremely difficult for him.

8. In May 2013, Daniel was complaining that he didn't feel well. We went see several doctors. Dan was misdiagnosed the first time. We opted to get a second opinion at UCSF, where they performed several CAT scans, blood work, and other types of testing. The Head of Oncology at UCSF told us Dan had a very rare bladder cancer and that it was already in its advanced stages. Dan had surgery to try and remove the tumor, but they couldn't get all of it. The doctor said that his cancer was everywhere and that it had spread extremely quickly. Dan underwent chemotherapy, which destroyed his body. It was devastating, but he was a fighter. He never gave up until the very end, when the doctors said there was nothing more they could do for him.

9. Dan was in a lot of pain. He couldn't walk, and it was difficult for him to urinate. He was on so many pain medications that I kept a list of all the meds and what times to give them to him. He would take oxycodone, and then an hour later, he'd take fentanyl. As time went on, they were introducing more pain medications. I remember there was one called "the lollipop." It was like a lozenge that he had to suck on so the pain medication could enter his system at a steady rate. He had tubes in his kidneys and needed help moving around and going to the bathroom. We also had to give him shots and assist him with showering. It was a really difficult time.

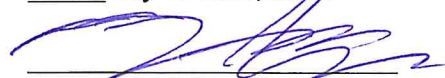
10. Dan was worried because he knew he wasn't going to make it. Before he died, when he knew dying was inevitable, he wrote me and the kids a letter. My husband said to me, "I've led a beautiful life. I have no regrets being a fireman and doing my job. If I had to do it all over again, I would." That's the kind of person he was. He was always there to help. He also said how much he would miss his family.

11. Emotionally, it was crushing for Dan, but he was a trooper. He never gave up hope. He wanted the doctors to do everything they could to help him. Sometimes, he felt like it was one step forward, twenty steps back. He was always waiting for hope that it would be okay, but it never was. My husband was only sixty-three years old when he died. He had just retired. We had so many plans. We were going to travel and do many things together. He worked a lot and deserved to have a happy retirement. He was so hard-working. He retired from the San Francisco Fire Department as a Captain. He's missing out on so much. We just had our first grandchild, and she is now a month old. He would have been the greatest, most loving grandfather. Our youngest son is getting married in September. He would have been so proud of him. Daniel is missing out on all these things that he should be here for. It hurts.

12. I never want Dan to be forgotten. He should always be remembered. He is part of the 9/11 Memorial. His picture is there. His picture is also on the limited-edition MetroCard of 9/11 first responders. Daniel was a man who gave his life to help others. He went to the World Trade Center that day to help people. He had no regrets about that. He would have done it again in a heartbeat. That's who he was. He was a true first responder, in every sense of the world. He gave his life for others.


DORIS ARMENTA

Sworn to before me this
10 day of June, 2022


Notary Public



Estate of Keith Edward Atlas

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

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ELAINE E. MANDELKOW, et al.,

**AFFIDAVIT OF
DONNA RUTH ATLAS**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

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STATE OF CALIFORNIA)

: SS.:

COUNTY OF SAN DIEGO)

DONNA RUTH ATLAS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 1910 Jag Court, El Cajon, CA 92059.

2. I am currently 68 years old, having been born on August 2, 1953.

3. I am the wife of Keith Edward Atlas, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.

4. My husband passed away from lung cancer on April 4, 2014, at the age of 58. It was determined by the World Trade Center Health Program that this illness was causally connected to his exposure to toxins resulting from the 9/11 terrorist attacks.

5. On November 7, 2014, I was appointed personal representative of my husband's estate in the Superior Court of California, San Diego County Probate Division.

6. Keith and I knew each other for forty years. He was my best friend and the love of my life. We traveled back and forth for four years from New York to California, before we

finally got married in 2007. We enjoyed life. When he was here in California, we loved to go to the beach. He loved the water. We would just enjoy everything together—going out to eat, walking on the beach, everything. Whatever California had to offer; we would take advantage of. Plays, movies, and spending time with our families.

7. Keith was an FDNY firefighter, as were many of his family members. His brother, Greg Atlas, was in the first tower before it collapsed, and his body was never found. Keith wasn't working on 9/11, but he was worried about his brother, so he drove down to the World Trade Center site to go searching for him. Keith was searching through the rubble for about a week or so. He said it was a bizarre scene, that you couldn't even get your bearings straight because you were surrounded by black smoke and rubble on the pile. Greg's widow explained to me how horrible it was down there. The firemen had no masks, nothing protective to keep them out of harm's way.

8. In around the summer of 2013, Keith was back east, visiting his family. His sister was a World Trade Center Health Program nurse, and she recommended that Keith go and get checked out. So, he did. Within an hour of getting home, the doctors called him and said you need to come in. And that's when they found the tumor in his lungs, right near his heart. We had no idea anything was wrong; we were shocked. He was treated at Sloan Kettering. He did two types of chemotherapy with a steroid, then another treatment.

9. Keith wanted to come back to California. In December 2013, he was able to come home for Christmas. He didn't want to be in New York anymore. The chemotherapy took everything out of him. He was okay for the first few days after coming home, but soon after he was wiped out. He was in so much pain. His body diminished so quickly; it was emasculating. He was losing weight, losing hair, constantly itching, and in excruciating pain. His quality of life was just horrible. This was once a vibrant man, and he fell into a very bad depression. He stopped eating, couldn't go to the bathroom, and couldn't walk. He even had a hard time sleeping, as the tumor was so big that he couldn't lie comfortably. Keith lived for only another few months.

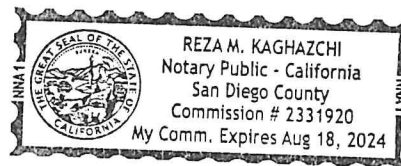
10. I wouldn't wish what Keith went through on anyone. There wasn't a kinder or gentler man that I've ever met. He also was an outstanding fireman. All the Atlases are firemen,

and they are all exceptional. The whole family. He was a true testament to the FDNY.

Donna Ruth Atlas
DONNA RUTH ATLAS

Sworn to before me this
14 day of April, 2022

Reza M. Kaghauchi
Notary Public



Estate of Artur S. Becker

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

ELAINE E. MANDELKOW, et al.,

**AFFIDAVIT OF
JUDITH A. BECKER**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)

: SS.:

COUNTY OF QUEENS)

JUDITH A. BECKER, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 148-26 29th Avenue Apt 21D, Flushing, NY 11354.

2. My current age is 67, having been born on September 10, 1954.

3. I am the wife of Arthur S. Becker, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.

4. My husband passed from liver cancer on July 2, 2012. It was determined by the World Trade Center Health Program that this illness was causally connected to his exposure to toxins resulting from the 9/11 terrorist attacks.

5. On June 11, 2013, I was issued Letters Testamentary on behalf of my husband's estate by the Queens County, New York Surrogate's Court.

6. Arthur ("Artie") was a hard worker, and we had a good relationship. Everything was wonderful. He was an outgoing man who everyone loved. He was kind and gentle. Everything was great between our two families. We had the usual ups and downs, but everything was great until he got diagnosed.

7. On September 11, 2001, I was teaching daycare in my neighborhood. I worked from 8:00 am to 6:00 pm, and I opened the school on that day. When the attacks happened, parents were coming in frantically to pick up their children. I was nervous because I didn't know where my husband was. He was an EMT. Artie responded to the first attack on the World Trade Center in 1993 and even responded to Hurricane Katrina. At the daycare center, people were crying, coming to pick up their kids. I was just trying to do my job, but I was scared. I knew that it was my husband's calling from God to save people. He was down there every day in the days after 9/11, triaging victims. A lot of people he knew died in the collapse. The whole time, they were saying the air was safe. But I thought to myself, "How is that possible?" With all the fragments that had blown up from the building, the asbestos, and dust, I knew it couldn't be safe. I didn't see Arthur for three weeks straight.

8. Several years after 9/11, Artie started to become more tired. He'd come home from his job and not eat as much. But he kept it to himself, like he was holding something in. I knew something was wrong. He started to have stomach pain, and said, "Oh, I just have indigestion." When he was diagnosed with liver cancer in 2011, he was given a three-month prognosis to live without treatment.

9. He began to undergo chemotherapy treatment. The first time he came out of chemo, his blood pressure went way up. He got diabetes from the cancer, which he never had before. His feet became so swollen from the diabetes that we could hardly fit his feet in his shoes. He hated the chemotherapy pills because they upset his stomach, and we had to change his diet. He underwent radiation, too. Then his colon started to fail, and he had to get a colostomy bag put in. He lost so much weight and was deformed with black marks all over him. It was terrible.

10. His mental condition started to completely deteriorate as well. He would scream at the clouds, "God, take me now." I'm not sure if it was dementia but he was mentally deteriorating. He would yell and scream at me, telling me to leave him alone. By that time, they realized there was nothing else that they could do. In June 2012, he went to the hospital for the last time.

11. Artie was a hero. He gave his heart. He gave everything and asked for nothing in return. He left home on 9/11 not knowing if he'd ever see me again, but he still went. Before his mind started to go, he would watch recordings of the attacks on television. He would sit there

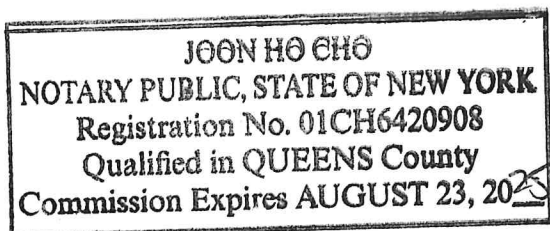
and cry. He told me that he had to remember the attacks—even though he was dying as a result of it. Artie was the strongest man I know, and being an EMT was his calling from God. He had no regrets and said he would do it again. Three hundred people came to his wake.

12. As time went on, I went down to the new World Trade Center building. It was hard for me, as I have fibromyalgia, anxiety and other medical issues. But we have to remember, always. Artie and I were married for thirty-two years, just shy of thirty-three years when he died. Whenever my dog sees an ambulance, he will bark and look for Artie. I was just proud to be his wife and to know him. I think it was God's will. He did what he had to do.


JUDITH A. BECKER

Sworn to before me this
12th day of April, 2022


Notary Public



Estate of Charles Michael Benson

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

ELAINE E. MANDELKOW, et al.,

**AFFIDAVIT OF
PATRICIA BENSON**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)

: SS.:

COUNTY OF ORANGE)

PATRICIA BENSON, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 267 Burlingham Road, Pine Bush NY 12566.

2. My current age is 79, having been born on November 30, 1942.

3. I am the wife of Charles Michael Benson, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.

4. My husband passed away from lymphoma on September 1, 2012. It was determined by the World Trade Center Health Program that this illness was causally connected to his exposure to toxins resulting from the 9/11 terrorist attacks.

5. On September 4, 2013, I was appointed personal representative of my husband's estate in the Orange County, New York Surrogate's Court.

6. It's been ten years since Charles passed, and every time I talk about him, I start crying. We had such a happy life. He was retired since 1988. We bought a home on a lake in Maine, which he loved to go to. He loved fishing, boating, and hunting. We loved going on

vacations. We had tentatively planned to go on a river cruise with friends around the time that he was diagnosed. We loved to go out dining with friends. In the mornings, we'd meet up at Panera Bread for coffee. We had sold our Maine residence and added a suite onto our daughter's home in Pine Bush, New York so we could be with her in our retirement. We were together a lot, and we were happy.

7. On September 11, 2001, I was at work. I couldn't believe my eyes at what I was seeing on television. I got on the phone with Charles, who was a retired forensic photographer for the FDNY. He said, "Patricia, I spoke to the photo unit, and I'm going down there to take pictures with them." So, he went down to the World Trade Center site on 9/12/2001. He was there for quite a long time, probably for weeks. He didn't have to go, but that was the type of man he was. We didn't talk much about what he saw. He told me it was horrific, but not much more. He was a man of few words.

8. In the spring of 2011, Charles told me he was having pain on the right and the left side of his stomach. He went to the doctor, and they sent him for tests. They said he had non-Hodgkin's lymphoma. I was devastated. But you never think it'll have a bad ending. You think you're going to beat it. Usually, this is a cancer that you can survive. So, we thought he'd be alright. He was a healthy person before he was diagnosed with lymphoma and always watched his diet. He started his chemotherapy in June 2011. He tried to keep up good spirits, staying busy even while he was getting his chemotherapy. He would teach classes to new volunteer firemen at the firehouse. By November 2011, his bloodwork showed that the lymphoma was gone. We were overjoyed, elated that it worked, and the doctor was so happy too. Life was good. The holidays came and went. We were with family. Everyone was happy.

9. In February 2012, we went back to the doctor for more bloodwork. The doctors told us that Charles's lymphoma was back with a vengeance. It was gut-wrenching. I remember coming out of the doctor's office after learning that. We got in the car, and I said, "Chuck, I don't want you to die." He said, "Patricia, I don't want to die." He had so much to live for. We had people come and visit him, but soon after he told me, "Tricia, no more people coming to the house except for you and our children." It was too much for him.

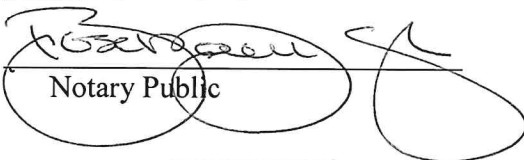
10. He had a lot of pain in his abdomen area soon after that. He was weak all the time. We went to other doctors to see if we could get a stem cell transplant, but none of the treatments would have been effective for him. The cancer had spread. He was getting progressively worse

and worse. His appetite was so bad, and he was losing weight. He also became less alert. Toward the end, he was in the hospital. I took care of him in hospice for two weeks, but he was barely even awake during that time because he was so sedated from the pain medication. Even through all of that, I didn't believe that he would die. I couldn't face the fact that this was the end. In the end, the doctors said there's nothing more that we can do.

11. Whenever I learn something new, good or bad, a fleeting thought comes to me, "Oh, I should tell Chuck." But he's not there for me to tell him. It's been almost ten years that he's passed. It's hard to believe that he's gone. He didn't have to go down there after 9/11. But that was the type of person he was. He loved to help people. He was the fire safety officer in our town. When he died, they blocked off the street for his funeral because so many people attended. Hopefully, he is watching over us. If he didn't respond to the World Trade Center, he would be here today. But he had to go down there and do what he loved to do—helping people in whatever way he could.


PATRICIA BENSON

Sworn to before me this
13th day of April, 2022


Notary Public

ROSEMARIE LEE
Notary Public, State of New York
No. 01LE6018825
Qualified in Dutchess County
Commission Expires June 29, 2023

Estate of John Bohlmann

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
ELAINE E. MANDELKOW, et al.,

**AFFIDAVIT OF
BETTE FRANCIS BOHLMANN**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF MARYLAND)
 : SS.:
COUNTY OF WORCESTER)

BETTE FRANCIS BOHLMANN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 81 Hingham Lane, Berlin, MD 21811.

2. My current age is 73, having been born on June 9, 1948.

3. I am the wife of John Bohlmann, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.

4. My husband passed from metastatic mesothelioma on October 29, 2017. It was determined by the World Trade Center Health Program that this illness was causally connected to his exposure to toxins resulting from the 9/11 terrorist attacks.

5. On January 4, 2019, I was appointed personal representative of my husband's estate by the Register of Wills in Worcester County, Maryland.

6. My husband and I married when I was seventeen years old, and we were married for fifty-three years before he died. He was my everything, my best friend, my lover, my life. We had a very active life. We had two children, and an unexpected third child in 1981. We did

lots of family activities together. When the kids got older, we bought a boat and would travel all over Long Island with the boat. John would take blocks of time off to travel, but he never missed a day at work. He was a Marine, and he was always very strong and tough. He never got sick. He was a very proud man. Prior to 9/11, we were thinking about his retirement. John had worked since he was 16 years old. We were looking forward to retirement and wanted to move, so we started to look at areas we could retire to. He wanted to take time to read books and be in nature. We found some property in Maryland by the water, where we brought our boat. We moved there in 2000.

6. John was a manager for an insulation installing company, and he worked mainly in downtown Manhattan. He almost lost his life in the first attack on the World Trade Center in 1993. He was supposed to meet with an engineer there, but he was late to the meeting. He was there when the bombs exploded. He always worked in the World Trade Center and the Marriott nearby. There were always renovations going on. When the attacks happened on 9/11/2001, John immediately began working on the clean-up. I remember his employees were sleeping on the floor of my house. He worked for eighteen months at the World Trade Center and in the surrounding area. He was responsible for wrapping all the phone lines above ground so they could get the stock market up and running again. I went down there once with him. The destruction was unbelievable.

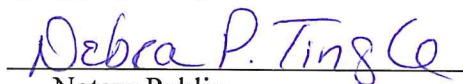
7. In 2003, John retired, and we moved to Maryland full time. In 2004, he began to have issues with his prostate. They weren't sure if it was cancer. These problems recurred in 2006. He had esophageal problems and had difficulty swallowing and keeping food down. He had to undergo esophageal dilations several times. By late 2013, I began to notice major changes in his breathing, energy level, and ability to walk. He was also an avid walker and would walk around the neighborhood. But he had really slowed down. He had severe shortness of breath. I would bring it up to my husband, who told me that he was okay. But my son Johnny, who also responded to Ground Zero, insisted that John be seen by a World Trade Center Health Program doctor. He got certified for his medical conditions around 2014. I made appointments for my husband with the cardiologist and pulmonologist to figure out why his breathing was so impaired. We went to a lung specialist at a regional hospital in Maryland, who found asbestos scarring on his left lung.

8. His asbestos scarring soon turned into cancer. The WTCHP doctors did many biopsies on him, and that's how they found the thyroid cancer and the lung cancer. We spent a lot of time with doctors, and our lives became medically focused. He couldn't sleep on his side because of the pain in his lower left lung. Every day, his pain was getting worse and worse. It was horrible watching a vibrant man begin to dissipate. He couldn't sleep or eat. Once they opened him up for surgery in 2017, it was hell knowing that he wouldn't last. I had to push him around in a wheelchair, he could barely function. He had never had pain like this before. He was on oxygen, and we had to carry him to the bathroom. We had so many emergency trips to the hospital, it was traumatizing.

9. Someone has to take responsibility for the lives lost, even if it is monetary responsibility. John's life mattered to me and my children. He was stolen from all of us, especially me. I try to be stoic for my children. For two and a half years I was in a very dark place. I lost the only person that I loved all my life. What I wanted in life was to be with him. I cried all the time, day and night, but I kept my suffering to myself. When you lose someone, an emptiness grows inside of you. Especially when you lose the person you build your life around.


BETTE FRANCIS BOHLMANN

Sworn to before me this
18th day of April, 2022


Notary Public

My commission Expires Oct. 7, 2024